

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>ARRIVAL STAR S.A. and MELVINO TECHNOLOGIES LIMITED,</b>	)	
	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 06C-0051</b>
	)	<b>Honorable Rebecca R. Pallmeyer</b>
<b>PILOT AIR FREIGHT CORP.,</b>	)	
	)	
<b>Defendant.</b>	)	

**Defendant's Motion for Transfer of Venue Under 28 U.S.C § 1404(a)**

Pursuant to 28 U.S.C. § 1404(a), Defendant, Pilot Air Freight Corp. ("Pilot"), moves this Honorable Court for an order transferring this action to the U.S. District Court for the Eastern District of Pennsylvania. In support of this Motion for Transfer of Venue, Pilot states:

1. Defendant, Pilot Air Freight, is located in the Eastern District of Pennsylvania — in Lima, Pennsylvania. Lima, PA is the site of Pilot's headquarters and is also the location where the challenged activity takes place. Furthermore, the relevant physical evidence and Pilot's employee witnesses are located in Lima, PA.

2. Plaintiff Arrival Star, s.a., is a corporation organized under the laws of Luxembourg with offices at 67 Rue Michel, Welter L-2730, Luxembourg.<sup>1</sup> Plaintiff Melvino Technologies Limited is a corporation organized under the laws of the British Virgin Island of Tortola. It claims a principal place of business in Road Town, Tortola, British Virgin Islands.

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<sup>1</sup> The original Complaint named "Arrival Star Inc." as the plaintiff, with a principal place of business in Delray Beach, Florida. How or why Arrival Star Inc. became Arrival Star s.a. of Luxembourg makes little difference for this Motion. Neither location is within the boundaries of the Northern District of Illinois, nor is it any closer to this District than to the Eastern District of Pennsylvania. Indeed, as discussed herein, each is closer to the Philadelphia area.

(Am. Compl. ¶ 2.) Neither Arrival Star nor Melvino alleges any corporate headquarters, business locations, or any employees in the Northern District of Illinois. Neither is incorporated in Illinois. (Am. Comp. ¶ 2.) The only apparent reason plaintiffs filed this case here, in the Northern District of Illinois, is that this is where their attorneys are located.

3. 28 U.S.C. § 1404(a) allows this Court to transfer a case to another district for the convenience of parties and witnesses and in the interest of justice. All factors indicate that transfer is appropriate in this action. The convenience of witnesses and parties, as well as the interests of justice, support transfer to the Eastern District of Pennsylvania.

4. In support of this Motion, Pilot has filed a Memorandum of Law in Support of the Motion for Transfer of Venue Under 28 U.S.C. § 1404(a), which it incorporates herein.

WHEREFORE, Pilot requests that the Court enter an order transferring this action to the U.S. District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

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Dated: February 25, 2006

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